

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION

SOUTHERN DISTRICT OF MISSISSIPPI
FILED

Latasha Hill,
Plaintiff

v.

JUL 15 2025

ARTHUR JOHNSTON
BY DEPUTY

AUTO CLUB FAMILY INSURANCE COMPANY,
Defendant.

Case No.: 2:24-cv-00107-KS-BWR

Date: July 15, 2025

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF CLAIMS MANUAL AND
SUPPLEMENTAL RESPONSES TO DISCOVERY REQUESTS**

Plaintiff, Latasha Hill, proceeding propria persona, pursuant to Federal Rules of Civil Procedure 26, 34, and 37, and Local Uniform Civil Rule 37(a) of the United States District Court for the Southern District of Mississippi, respectfully moves this Court to compel Defendant Auto Club Family Insurance Company ("Defendant") to produce the Claims Manual and related claims handling documents responsive to Plaintiff's Requests for Production.

In support, Plaintiff states as follows:

1. Plaintiff served discovery requests, including requests for the Defendant's Claims Manual and related documents directly relevant to Plaintiff's claims of bad faith, breach of contract, and unfair claims practices.

2. Defendant has failed to produce the Claims Manual and related claims handling documents,

claiming untimeliness without addressing its ongoing duty under Rule 26(e) to supplement responses.

3. Federal Rule of Civil Procedure 26(e)(1) imposes a continuing duty to supplement incomplete responses, regardless of the discovery deadline.

4. The Claims Manual and related documents are highly relevant under Rule 26(b)(1) and routinely ordered for production in insurance cases involving allegations of bad faith.

5. Plaintiff has made good-faith efforts to resolve this dispute, including offering to meet and confer via a recorded teleconference, as required by Rule 37(a)(1) and L.U.Civ.R. 37(a).

WHEREFORE, Plaintiff respectfully requests that the Court:

A. Compel Defendant to produce the Claims Manual and related claims handling materials within three days;

B. Compel Defendant to provide a privilege log under Rule 26(b)(5)(A) for any withheld documents;

C. Award Plaintiff reasonable costs associated with this motion under Rule 37(a)(5);

D. Grant any other relief deemed just and proper.

Respectfully submitted this 15th day of July, 2025.

By: Satanta Kies

Latasha Hill
Propria Persona
Sui Juris
Without Prejudice
UCC 1-308

Notary Witness and Acknowledgement

United States of America }
State of Mississippi } s.a.
County of Forrest }

Today before me, a Commissioned Notary, is the living, flesh and blood, and natural woman known to be Latasha Hill and she did issue this Formal Motion To Compel and she also affirmed her testimony as shown before me this 15 day of July in the year 2025, in Witness whereof I set my Signature and Seal:

Tammy Holmes
Public Notary Printed Name

July 15, 2025
Date

Date


Tony
Public Notary Signature

Public Notary Signature

July 29, 2025
Commission Expire



Latasha Hill
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601-202-3262
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CERTIFICATE OF SERVICE

**Motion For Sanctions Pursuant To FRCP 26, 34, 37 and L.U.Civ.R.37(a) For Defendant's
Bad Faith Discovery Violations**

This letter serves as formal notice of Plaintiff's Motion To Compel against you and your client for violations. I, Latasha Hill, certify that on July 15, 2025, I will serve this Motion To Compel, on Priscilla K. Williams via email pkwilliams@csattorneys.com and pkw@csattorneys.com.

Method of service: [X] Email

Priscilla K. Williams
CHRISTIAN & SMALL, LLP
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By: /s/ Latasha Hill
Latasha Hill
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Sui Juris

Latasha Hill
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